

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LOYALTY CONVERSION SYSTEMS CORPORATION, Plaintiff, v. AMERICAN AIRLINES INC.	Case No: 2:13-cv-655-JRG (Lead Case)
JETBLUE AIRWAYS CORPORATION, Defendants.	Case No. 2:13-cv-662-JRG

AGREED MOTION TO EXTEND DEADLINES

Plaintiff Loyalty Conversion Systems Corporation (“Plaintiff” or “Loyalty Conversion”) and Defendant, JetBlue Airways Corporation (“JetBlue”) hereby move to extend the 30(b)(6) deposition date of JetBlue, and the Plaintiff’s deadline to respond to JetBlue’s Rule 12(b)(3) Motion to Dismiss. Counsel for JetBlue has been ill, and the parties agree to move the dates set forth in the Court’s December 23, 2013 Order (D.E. 24) as follows:

1. Plaintiff and Defendant JetBlue have agreed that Plaintiff’s deposition of JetBlue’s corporate representative pursuant to the Court’s December 23, 2013 Order (D.E. 24) will be rescheduled for February 5, 2014.
2. Plaintiff’s deadline to respond to Defendant JetBlue’s Rule 12(b)(3) Motion to Dismiss be extended to and including February 19, 2014.
3. Good cause exists for moving these dates because lead counsel for JetBlue was diagnosed with strep throat on January 8 and did not return to the office until January 13.

Dated: January 13, 2014

Respectfully submitted,

/s/ Andrew G. DiNovo

Andrew G. DiNovo
Texas Bar No. 00790594
Adam G. Price
Texas Bar No. 24027750
Stefanie T. Scott
Texas Bar No. 24061617
DiNovo Price Ellwanger & Hardy LLP
7000 N. MoPac Expressway, Suite 350
Austin, Texas 78731
Telephone: (512) 539-2626
Facsimile: (512) 539-2627

**ATTORNEYS FOR PLAINTIFF
LOYALTY CONVERSION SYSTEMS
CORPORATION**

/s/ Casey L. Griffith

Casey L. Griffith
State Bar No. 24036687
Austin S. Champion
State Bar No. 24065030
Klemchuk Kubasta LLP
8150 N. Central Expressway, 10th Floor
Dallas, Texas 75206
214.367.6000 (telephone)
214.367.6001 (facsimile)
casey.griffith@kk-llp.com
austin.champion@kk-llp.com

**COUNSEL FOR DEFENDANT
JETBLUE AIRWAYS CORPORATION**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email and/or fax, on this the 13th day of January 2014.

/s/ Casey L. Griffith

Casey L. Griffith

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h), and that Plaintiff concurs with the relief sought in the foregoing motion. The personal conferences were conducted between Andrew G. DiNovo and Stefanie T. Scott, attorneys for Plaintiff, and Casey L. Griffith, counsel for Defendant, on or around Friday, January 10, 2014 and Monday, January 13, 2014. The parties were able to agree on the substance of the Agreed Motion as reflected above.

/s/ Casey L. Griffith

Casey L. Griffith